EPEAT Program
Continuous Monitoring Outcomes Report

Imaging Equipment
IE-2023-01
November 21, 2023

1.0 Background

EPEAT® is a comprehensive voluntary sustainability Type 1 ecolabel that helps purchasers identify sustainable technology products and services. Central to EPEAT are conformity assurance activities that meet the technical rigor and credibility needs of the institutional purchasers who rely upon EPEAT. The EPEAT Program ensures the ongoing conformance of EPEAT-registered products through an ongoing surveillance process known as Continuous Monitoring. Continuous Monitoring activities occur throughout the year and test the ability of Participating Manufacturers to prove conformance with EPEAT Criteria on an ongoing basis.

Some Continuous Monitoring activities require that Investigations be conducted in discrete timeframes called Rounds. The EPEAT Program develops an individual plan for each Continuous Monitoring Round, which specifies the EPEAT Criteria to be investigated, the method of investigation that GEC-approved Conformity Assurance Bodies (CABs) must use and the specific dates when the Investigation activities must be completed. The EPEAT Program also selects the Participating Manufacturers and EPEAT-registered products and assigns Investigations to CABs, which must fully participate in and are responsible for implementing Continuous Monitoring Round activities with their Participating Manufacturer clients. Participating Manufacturers are required to cooperate fully with their GEC-approved CAB during Round activities.

To maintain the level of transparency relied on by purchasers, the EPEAT Program publishes an Outcomes Report at the conclusion of each Round to summarize the activities conducted and to identify the products and Participating Manufacturers that received nonconformances and the actions taken to restore accuracy of the EPEAT Registry.

This document summarizes the activities and results of Continuous Monitoring Round IE-2023-01 conducted for the Imaging Equipment category.

2.0 Overview of Continuous Monitoring Round IE-2023-01

2.1 Investigation Activities

As per the published Round Plan, Continuous Monitoring Round IE-2023-01 used Level 2 Investigations (laboratory evaluation of products to determine the products' conformance with specific EPEAT Criteria). GEC-approved CABs obtained the products, as identified by the EPEAT Program, from the open market without involvement of the Participating Manufacturers, where possible, and sent them for laboratory evaluation. The laboratories evaluated the products against the specified Criteria and produced reports summarizing the activities conducted and the results. GEC-approved CABs reviewed the reports, made recommendations on conformity, and sent the reports to the EPEAT Program. The EPEAT Program made the final decisions on conformity for the Investigations.

2.2 Criteria Investigated

Continuous Monitoring Round IE-2023-01 focused on chemicals of concern. The production of electronics often involves over 500 chemicals, while electronic devices potentially contain up to 84% of all known stable chemical elements. Chemicals in electronic products and processes serve important technical functions, however they are sometimes used without full knowledge of their environmental or human health hazards. These chemicals can present risks of exposure throughout the product's life cycle—and toxic chemicals used in creating electronics can cause serious health issues, including cancer, nerve damage, and reproductive issues. Once released into the environment, hazardous chemicals can also change soil or water, ultimately leading to the loss of plant or animal life.

In the electronics industry, chemicals of concern remain an on-going challenge as the industry seeks safer and more sustainable alternatives for hazardous chemical substances. Manufacturers can better prepare for and lessen their risk of supply chain interruptions and high switching costs associated with regulatory restrictions by having greater clarity into the contents of their devices. Minimizing the use of hazardous chemicals in electronics and embracing safer alternatives is critical to achieving sustainable consumption and production. Given the global nature of electronics value chains and the potential reach of problematic chemicals, the social and economic burden of chemicals of concern in electronics is not confined to certain people or places related to manufacturing or use—their potential impact can be global in scale, and for this reason, the EPEAT Program selected criteria which address chemicals of concern for investigation in this Round.

Products were randomly selected (using a random number generator) from a list of Participating Manufacturers. Each product was investigated for the criteria identified in the table below, however if a product had not selected a criterion, that criterion was not investigated.

Table 1: Criteria Investigated in Round IE-2023-01

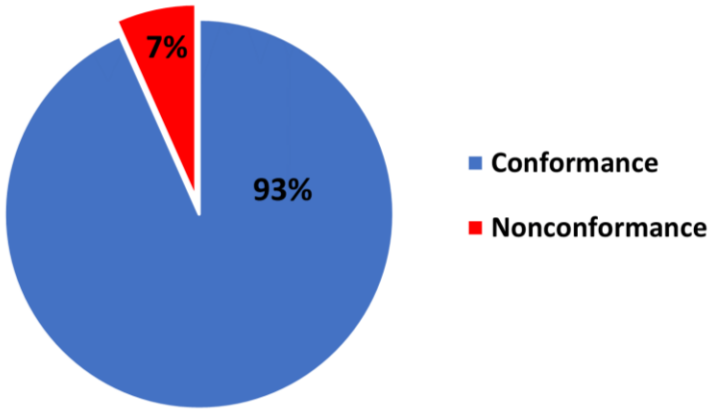
Criteria Number	Criterion Title
4.1.1.1	Compliance with provisions of European RoHS Directive upon its effective date
4.1.2.1	Further reduction of the use of European Union RoHS Directive hazardous substances (cadmium)
4.1.5.1	Compliance with provisions of European Union Battery Directive
4.1.6.1	Reducing BFR/CFR/PVC content of external plastic casings
4.8.1.1	Elimination of intentionally added heavy metals in packaging

3.0 Summary of Investigations and Final Decisions on Conformity for IE-2023-01

Highlights from this Continuous Monitoring Round are:

- **15** investigations completed
- **14** decisions of Conformance
- **1** decision of Nonconformance *Further details provided in Section 4*

Figure 1: Final Conformity Decisions for IE-2023-01
(shown as percentage of total investigations)



4.0 Further Details on Nonconformances for IE-2023-01

Table 2 below provides a breakdown of the nonconformances by Criterion. All nonconformances must be categorized as either a minor error, nonconformance, or nonconformance due to CAB inaction or delay not attributable to the Participating Manufacturer.

Table 2: Breakdown of Nonconformances by Criterion for IE-2023-01

Criteria Number	Criterion Title	Completed Investigations	Nonconformances	Nonconformance Rate
4.1.1.1	Compliance with provisions of European RoHS Directive upon its effective date	3	1	33%

There was only one non-conformance in Continuous Monitoring Round IE-2023-01, and it was a demonstrated nonconformance.

4.1 Minor Errors Versus Nonconformances

All nonconformances must be categorized as either a minor error, nonconformance, or nonconformance due to CAB inaction or delay not attributable to the Participating Manufacturer. For Level 2 Investigations, nonconformances may be categorized as minor errors if a GEC-approved CAB is unable to obtain a product from the market and the Participating Manufacturer indicated the product has reached end-of-life and is no longer available on the market. All nonconformances that do not meet the definition of minor errors are categorized as nonconformances (unless they are due to CAB inaction or delay).

In Continuous Monitoring Round IE-2023-01 there were no minor errors or nonconformances.

5.0 Actions to Restore Conformance

Where the final conformity decision is nonconformance (including minor errors and those due to CAB inaction or delay), Participating Manufacturers must make corrections to restore the accuracy of the EPEAT Registry during the Corrective Action Phase. These activities may include providing additional evidence to demonstrate

conformance with the criterion or unselecting the criteria in the EPEAT Registry. Where the product was found nonconformant and is no longer available in the marketplace, the product must be archived.

During the Corrective Action Phase, Participating Manufacturers must also develop Corrective Action Plans for other EPEAT-registered products that may be affected by the same underlying issue causing the nonconformance but were not the subject of investigation (called "similarly affected products").

The following action was taken to restore accuracy to the EPEAT Registry as a result of Continuous Monitoring Round IE-2023-01:

- **1** investigation Product archived by the CAB or by the EPEAT Program

Table 3 in Section 7 identifies the Participating Manufacturers and products that received nonconformances in Continuous Monitoring Round IE-2023-01.

6.0 Key Findings

6.1 Requirement for Optional Criterion 4.1.2.1— Further reduction of the use of EU RoHS Directive hazardous substances (Cadmium)

Participating Manufacturers and CABs are reminded that Criterion 4.1.2.1 restricts the use of RoHS cadmium exemptions. Evidence and/or testing must demonstrate that RoHS-allowable cadmium exemptions are not used.

6.2 Required Criterion 4.8.1.1— Elimination of intentionally added heavy metals in packaging

Participating Manufacturers and CABs are reminded that for incidental presence, the sum of the concentrations of lead, cadmium, mercury, and hexavalent chromium present in any packaging component shall not exceed 100 ppm by weight. This means the combined total must be less than 100 ppm. Therefore, when testing to this criterion, the detection limit must be low enough to ensure the combined total is less than 100 ppm.

7.0 Identification of Nonconformances and Corrections Made by Participating Manufacturers

In the interest of transparency, the EPEAT Program identifies the Participating Manufacturers and products that received nonconformances and the actions taken to restore accuracy of the EPEAT Registry. Minor errors are generally clerical in nature and do not materially affect the validity of products in the EPEAT Registry. As such, these are not identified in the table below.

Table 3: Summary of Nonconformances and Corrections Made by Participating Manufacturers

Participating Manufacturer	Product	Product Type	Country	Criterion Number	Criterion Title	Required or Optional	Underlying Reason for Nonconformance	Corrective Action Taken
Riso Kagaku Corporation	RISO ComColor FT1430	Printer	United States	4.1.1.1	Compliance with provisions of European RoHS Directive upon its effective date	Required	Demonstrated nonconformance	CAB archived product

Document Control and Change History						
Issue	***Revision***	***Owner***	***Approver***	***Description***	***Approval Date***	***Effective Date***
1	*0*	*EPEAT Conformity Assurance Manager*	*Director, EPEAT Program*	*Initial release*		
1	*1*	*EPEAT Conformity Assurance Manager*	*Director, EPEAT Program*		*2018 Dec 11*	*2018 Dec 11*
2	*0*	*Senior Manager, Ecolabels and Resources*	*Senior Director, Ecolabels and Manufacturer Resources*	*Reformatting of document. Addition of standardized text.*	*2021 Mar 25*	*2021 Mar 30*
2	*1*	*Senior Manager, Ecolabels and Resources*	*Vice President, Ecolabels and Manufacturer Resources*	*Updated terminology for nonconformances to include "nonconformances" and "minor errors", in alignment with revisions to P66.*	*2022 Sep 15*	*2022 Sep 30*
2	*2*	*Senior Manager, Ecolabels and Resources*	*Vice President, Ecolabels and Manufacturer Resources*	*Updated to reflect new nonconformance category for CAB inaction or delay*	*2023 Mar 24*	*2023 Mar 24*